

FILED

FEB - 9 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. S1-4:14 CR 361 CDP
)
SHOICHI OKADA)
)
Defendant.)

SUPERSEDING INFORMATION

COUNT I

The United States Attorney charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital,
oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.
§2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high
speed data processing device performing logical, arithmetic or storage functions, including any

data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about January 1, 2013, and on or about November 3, 2014, within the Eastern District of Missouri and elsewhere,

SHOICHI OKADA,

the defendant herein, did knowingly possess material that contained images and videos of child pornography that was produced using materials that traveled in interstate commerce, to wit, a Seagate hard drive that was produced outside Missouri and therefore has traveled in interstate and foreign commerce, and said hard drive contained child pornography, including but not limited to the following:


a. "25701250dxh.jpg" – a graphic image file that depicts prepubescent minor females and a prepubescent minor male in a lascivious display of their genitals; and

b. "26279180msc.jpg" -- a graphic image file that depicts a prepubescent minor female in a lascivious display of her genitals;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney


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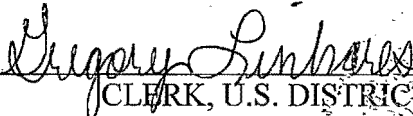
UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Robert F. Livergood, Assistant United States Attorney for the Eastern District of Missouri,
being duly sworn, do say that the foregoing information is true as I verily believe.



ROBERT F. LIVERGOOD, 35432MO

Subscribed and sworn to before me this 4 day of February 2016.



CLERK, U.S. DISTRICT COURT

By: 

DEPUTY CLERK